

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

SMALL BUSINESS ASSOCIATION OF  
MICHIGAN; CHALDEAN AMERICAN  
CHAMBER OF COMMERCE;  
STEWART MEDIA GROUP, LLC;  
POWER CONNECTIONS CO, LLC;  
DEREK DICKOW; SEMPER REAL  
ESTATE ADVISORS, LLC; and  
TIMOTHY A. EISENBRAUN,

Plaintiffs,

Case No. 1:24-cv-00314

vs.

JANET YELLEN, in her official capacity  
as the Secretary of the United States  
Department of the Treasury; UNITED  
STATES DEPARTMENT OF THE  
TREASURY; and HIMAMAULI DAS, in  
his official capacity as Acting Director of  
the Financial Crimes Enforcement  
Network,

Hon. Robert J. Jonker

Defendants.

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**\*\*\* EXPEDITED CONSIDERATION REQUESTED \*\*\***

**MOTION FOR PRELIMINARY INJUNCTION**

Under Rule 65 of the Federal Rules of Civil Procedure, the Plaintiffs move this Court for a Preliminary Injunction. Specifically, Plaintiffs seek an order enjoining the Defendants from either directly or indirectly enforcing the federal Corporate Transparency Act (the “CTA”), 31 U.S.C. § 5336, against the Plaintiffs, including the members of the Small Business Association of Michigan and the members of the Chaldean American Chamber of Commerce. The Defendants should also be enjoined from retaining or using any information pertaining to the Plaintiffs and their members that is or will be obtained under the CTA.

The basis for this motion is set forth in the attached memorandum in support and in the Verified Complaint.

Expedited consideration of this motion is necessary because a substantial portion of the relief requested may be rendered moot before the motion is briefed under the usual briefing schedule. *See* W.D. Mich. LCivR 7.1(e). Specifically, Plaintiff Semper Real Estate Advisors must disclose information under the CTA—including Plaintiff Timothy A. Eisenbraun’s personal information—on or before April 28, 2024. Plaintiff Power Connections Co is required to disclose the information demanded under the CTA—including Plaintiff Derek Dickow’s personal information—on or before June 13, 2024.

To prevent the Plaintiffs from suffering irreparable harm by being forced to disclose to federal law enforcement officials sensitive personal information to which the federal government is not entitled, the Plaintiffs respectfully request

that the Court expedite its consideration of this motion for preliminary injunction and issue a ruling on or before April 28, 2024.

MILLER JOHNSON  
Attorneys for Plaintiffs

Dated: March 26, 2024

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